

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
NICHOLAS BERNHARD, RALPH NATALE,
KIRK CONAWAY, and ROY KOHN as
TRUSTEES OF HEALTH FUND 917 AND THE
LOCAL 917 PENSION FUND,

ECF Filing

**NOTICE OF MOTION
10-CV-5596 (ADS)(ETB)**

Plaintiffs,

- against -

CENTRAL PARKING SYSTEM OF NEW YORK, INC.
and JOHN DOE,

Defendants.
-----X

To: Douglas Rowe, Esq.
Certilman, Balin, Adler & Hymen, LLP
Attorney for Defendant
90 Merrick Avenue, 9th Floor
East Meadow, New York 11554

PLEASE TAKE NOTICE that upon the following documents which are annexed
hereto:

- Certification of Susan Bruno, Esq.
- Certification of Joann Emmons
- Exhibit "A": Deposition Transcript
- Plaintiffs' Memorandum of Law

and all of the proceedings heretofore had in the above captioned action, the plaintiffs,
by and through their attorneys, Law Offices of Campbell & Associates, P.C., will move
this Court, on such date to be set by the Court at 100 Federal Plaza, Central Islip, New
York 11722, pursuant to Rule 15 of the Federal Rules of Civil Procedure for permission
to amend Plaintiffs' complaint to replace the "John Doe" defendant with Sonya Mitchell,
the Payroll Manager for defendant, Central Parking System of New York, Inc.

PLEASE TAKE FURTHER NOTICE that any papers in opposition to this motion
must be served on the undersigned by December 19, 2011.

Date: Floral Park, New York
November 29, 2011

LAW OFFICES OF CAMPBELL
& ASSOCIATES, P.C.

By: _____/s/_____
Susan Bruno (SB 6686)
Attorneys for Plaintiff
99 Tulip Avenue, Suite 404
Floral Park, New York 11001
(516) 352-0300